



Rocket Communications Corp.  
P.O. Box 4191  
Bartonville, IL 61607

December 28, 2017

To: Federal Communications Commission

Reg: Proceedings 17-258

Dear FCC Commissioners,

I, Joshua Powell, am the President of Rocket Communications Corp. located in central Illinois. After years of working for the local two-way radio company I noticed a significant demand for Internet service throughout central Illinois. In 2009 Rocket Communications was formed and we leased some tower space with a local two-way radio company and began testing point to multipoint wireless equipment. Rocket Communications currently serves approximately 400 business and residential Internet customers. We provide service to customers in areas where before we started offering service these areas were unserved by other providers, and in most cases had limited access to the Internet. Today we provide service to libraries, fire departments, churches, FM radio stations, and every size of businesses. We provide primary and backup Internet connections for local water districts, municipalities, and even 911 call centers. We offer business Internet speeds up to 1 Gbps and residential Internet speeds up to 50 Mbps.

Almost 10 years ago we invested heavily in the NN licensed equipment. In many cases the 3.65GHz equipment was our only option to connect with some customers. In May of 2016 we started deploying BaiCells LTE eNBs in the 3.65GHz band with the full expectation of being able to eventually migrate to the lower 3.5GHz band. Our LTE deployment was the second deployment in the US of BaiCells LTE wave 2. At the time this was a huge investment and of course a risk. Not knowing how the equipment would perform, we slowly deployed equipment in a small town in central Illinois. Fast forward a year and a half and now were utilizing the BaiCells LTE eNB at every new location and have been having great success. We currently have 5 of our 19 tower sites operating BaiCells LTE eNBs. We currently have another 12 eNBs in our staging area for deployments on our current towers. We also have an additional 12 new tower sites planned for deployment next year. The performance of this band 42/43 equipment has been an integral part in our ability to deliver a high speed and reliable Internet service to our customers.

We currently provide coverage in 9 counties however our coverage area does not encompass those 9 counties entirely. Our planned deployments and planned upgrades of existing tower sites with band 42/43 equipment would greatly enhance our coverage and service quality in those areas. The proposed CBRS rule changes would greatly deter future investments by my company. The proposed changes to increase the PAL area from census tracts to PEAs would effectively force us not to participate in PAL auctions. Considering that we provide service in 9 counties it would be likely that winning a bid for a PAL based on PEAs would be financially impossible. However, maintaining the current census tract based PALs and 3 year lease duration would continue to open up possibilities to deploy services in the CBRS band for our company. We already have a significant investment in CBRS capable equipment and would like to continue our investment in not only the band but our customers and future customers. Please do not use PEAs as a basis for geographical areas for the PAL auctions. Census tracts are much smaller and would enable us to participate in the PAL auctions and continue rapidly deploying new services to the rural areas of central Illinois. The FCC's website lists four strategic goals which need to be followed. In our opinion, the 2015 CBRS Rules embraces every one of these goals. However, changing the PAL rules DOES NOT meet these goals. We encourage each Commissioner to read and reflect upon these strategic goals as you make your decisions on this NPRM.

**Promoting Economic Growth and National Leadership**

**Protecting Public Interest Goals**

**Making Networks Work for Everyone**

**Promoting Operational Excellence**

Thank you,

Joshua Powell, President  
Rocket Communications Corp.